



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

January 3, 2022

**BY ECF**

The Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

**Re: *United States v. Ying Sun et al.*, 21 Cr. 343 (SHS)**

Dear Judge Stein:

A status conference in the above-captioned matter is scheduled for January 4, 2022. After conferring with and with the consent of defense counsel, the Government respectfully requests that the Court adjourn the conference for approximately 90 days.

Since the initial conference, the Government has produced substantial discovery materials. Nevertheless, with apologies to the Court and the defense, the Government has been delayed in completing its production of discovery materials, in part because much of the pertinent materials have had to be collected from various law enforcement agents around the country, who assisted in this long-running and geographically disparate investigation. The Government anticipates making another substantial discovery within the next two weeks, and is working expeditiously to collect and produce remaining electronically stored information and other records and data. As a result, the Government respectfully requests the adjournment to provide the additional time necessary to complete its discovery production, and for the defense to review the voluminous materials and advise the defendants.

In the event the Court grants the requested adjournment, the Government further respectfully requests that the Court exclude time under the Speedy Trial Act from January 4, 2022 until such date as the conference is adjourned for the above stated reasons. The Government submits that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

I have communicated with defense counsel for each of the defendants, who have all consented to the above requests.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

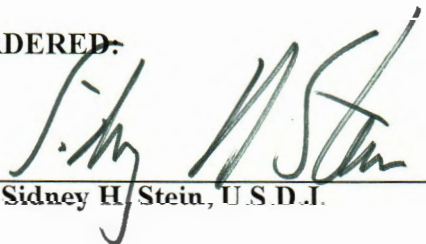
By:   
Brett M. Kalikow  
Assistant United States Attorney  
(212) 637-2220

cc: All counsel of record (via ECF)

The conference is adjourned to April 6, 2022, at 11:00 a.m. At the request of the parties, the time is excluded from calculation under the Speedy Trial Act from today until April 6, 2022. The Court finds that the ends of justice served by this continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to 18 U.S.C. 3161(h)(7)(A).

Dated: New York, New York  
January 4, 2022

SO ORDERED:

  
\_\_\_\_\_  
Sidney H. Stein, U.S.D.J.